

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

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AFSCME LOCAL 590	:	
HEALTH AND WELFARE FUND,	:	
By and through its Board of Trustees,	:	
Yvonne Harris, Jalil M. Shafi, Lloyd Frank, and	:	Docket No. 2:21-cv-02116-TJS
Angela Cabrera	:	
	:	
Plaintiff,	:	
v.	:	
	:	
O'NEILL CONSULTING CORPORATION,	:	
	:	
Defendant.	:	

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A BRIEF IN  
RESPONSE TO COUNTER-DEFENDANTS' MOTION TO DISMISS**

Defendant and Counter-Plaintiff O'Neill Consulting Corporation moves the Court to enter an order extending its deadline under Rule 7.1 of the Local Rules of Civil Procedure for the Eastern District of Pennsylvania.

1. On August 13, 2021, Plaintiffs and Counter-Defendants moved to dismiss O'Neill's counterclaim against them. [Doc. No. 19.] The deadline for O'Neill to oppose this motion is August 27, 2021.

2. Since the filing of the motion to dismiss, the parties have engaged in settlement negotiations and have reached a tentative agreement as to the monetary terms of a potential settlement. The parties are continuing to negotiate the non-monetary terms of a potential settlement. They expect to reach an agreement and finalize a settlement within 30 days at most.

3. To advance those settlement negotiations and avoid unnecessary costs, O'Neill requests that the Court enter an order extending its deadline to respond to the motion to dismiss by 21 days so that the new deadline would be September 17, 2021. O'Neill has contacted counsel for Plaintiffs, and undersigned counsel certifies that Plaintiffs do not object to this extension.

WHEREFORE Defendant and Counter-Plaintiff O'Neill Consulting Corporation prays that this Court grant its motion and enter an order extending its deadline to respond to the motion to dismiss its Counterclaims by 21 days.

Respectfully submitted,

**FREEMAN MATHIS & GARY, LLP**

Date: August 26, 2021

/s/ Justin J. Boron

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**ORDER**

Having considered the Unopposed Motion For Extension Of Time To File A Brief In Response To Counter-Defendants' Motion To Dismiss [Doc. No. 19], IT IS HEREBY ORDERED that the Motion is GRANTED.

IT IS FURTHER ORDERED that Defendant and Counter-Plaintiff's deadline to respond to Counter-Defendants' Motion To Dismiss in Doc. No. 19 is extended to September 17, 2021.

BY THE COURT:

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HON. TIMOTHY J. SAVAGE  
U.S. DISTRICT JUDGE

August \_\_\_, 2021